

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

**TRANSAMERICA INVESTMENT
GROUP, INC. dba SKY CARGO
SOLUTIONS, INC.**

Plaintiff,

V.

TRAVIS M. HAMILTON,

Defendant.

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CIVIL ACTION NO. 4:12-cv-01102

PLAINTIFF'S INITIAL DISCLOSURES

Transamerica Investment Group, Inc. dba Sky Cargo Solutions, Inc. (“Plaintiff”) files these initial disclosures as required by Federal Rules of Civil Procedure 26 (a) (1) (A).

1. Plaintiff expects to present the following witnesses:
 - (a) John B. Berry, 3714 Chevy Chase Drive, Houston, Texas 77019. 713-840-0110.
 - (b) Travis M. Hamilton, 5616 North Georgetown Road, Edmond, Oklahoma 73034 (telephone number unknown).
 - (c) William W. Rucker, attorney at law, 3355 West Alabama, Suite 825, Houston, Texas 77098, 713-528-2800.
2. If the need arises, Plaintiff may call the following witnesses:
 - (a) Wayne Starling, Senior Vice President; PNC Aviation Finance; 4355 West Emerald Street; Boise, ID 83706; (208) 472-2350
 - (b) Morgan Littell (formerly with PNC) current address and telephone number not known

- (c) Clay Healey; AIC Title; 6350 W. Reno; Oklahoma City, OK 73127; (405) 948-1811.
 - (d) Michael A. Scaers; 500 West Main Street, Suite 200; Oklahoma City, OK 73102; (405) 235-1516.
 - (e) Blair LaCorte, CEO; XOJET, Inc.; 2000 Sierra Point Parkway; Brisbane, CA 94005; (650) 676-4700
 - (f) Chuck Stumpf, Senior Vice President; XOJET, Inc.; 2000 Sierra Point Parkway; Brisbane, CA 94005; (650) 676-4780
 - (g) Currently unidentified representative of Lehman Brothers representative as seller of aircraft.
 - (h) Currently unidentified Wells Fargo Northwest, NA representative as trustee owner of aircraft for Lehman Brothers.
 - (i) Corporate representative of co-Defendant, Hamilton Capital Partners LTD, if different than co-Defendant, Travis M. Hamilton.
 - (j) Any currently unknown person or entity to whom either of the Co-Defendants may have fraudulently transferred all or any part of the considerations either of the Co-Defendants may have received from the sale of the aircraft in question.
 - (k) Any currently unknown person or entity that received or transferred proceeds that constituted an unpaid obligation to Plaintiff.
3. Exhibits. Copies of all documents referenced below will be submitted to Co-Defendants separately but simultaneously with Plaintiff's filing of these disclosures.
- (a) Plaintiff has copies of all communiques between Plaintiff and Co-Defendants since May 13, 2009.

- (b) Plaintiff will offer as evidence (i) two March 13, 2009 emails between John Berry and Travis Hamilton summarizing the original transaction; and (ii) Travis Hamilton's July 17, 2009 to John Berry setting forth the revised commission Plaintiff would receive from the sale of the aircraft in question.
- (c) The balance of such communiques may be offered if the need arises.
- (d) Plaintiff also has some information relative to the closing of the sale of the aircraft in question. Such information would be offered in evidence should the need arise.
- (e) Plaintiff also has communiques to and from PNC Bank regarding the financing of the sale of the aircraft in question. Such information would be offered in evidence should the need arise.
- (f) Plaintiff has information relative to commissions paid to it by PNC Bank as a result of its efforts in arranging financing for the sale of the aircraft in question. Such information would be offered in evidence should the need arise.

Respectfully submitted,

/s/ William W. Rucker

William W. Rucker
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Attorney for Plaintiff
TransAmerica Investment Group, Inc.
Dbas SkyCargo Solutions, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on October 1, 2012 a true and correct copy of the foregoing Initial Disclosures were served by email to counsel for Co-Defendants via United States Mail, facsimile, or by hand delivery to all parties.

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/William W Rucker/

William W. Rucker